

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE : CHAPTER 13
GOCHA GELASHVILI :
Debtor(s) : No. 22-11002 amc

ANSWER TO THE MOTION OF BANK OF AMERICA, N.A., FOR RELIEF FROM THE AUTOMATIC STAY

COMES NOW, Gocha Gelashvili, Debtor and Respondent, through counsel of record, Michele Perez Capilato, Esquire, and submits the following in response to the Motion for Relief from the Automatic Stay filed herein:

1-5. DENIED. The averments contained in these Paragraphs consist of summarizations or mischaracterizations of documents that speak for themselves, and they are denied as no response is required.

6. DENIED. Debtor acknowledges falling behind with post-petition payments to Movant, however, Debtor disputes the total amount of the arrears alleged in the Motion. Debtor is currently gathering proof of payments and will forward receipts to Counsel. Debtor is desirous of entering into a Stipulation with Movant to cure any remaining arrears.

7-12. DENIED. Debtor has insufficient information, knowledge, or belief to allow him to admit or deny this statement, therefore, it is DENIED.

WHEREFORE, Debtor/Respondent prays that Movant's Motion be DENIED, and that Debtor/Respondent receives judgment for reasonable costs and attorney fees incurred in connection with the defense of this Motion.

December 11, 2024

Respectfully submitted,

Law Offices of Michele Perez Capilato

By: /s/ Michele Perez Capilato
Michele Perez Capilato, Esquire
Identification No. 90438

500 Office Center Drive, Suite 400

Fort Washington, PA 19034

(267) 513-1777

Fax 1(866) 535-8160

michelecapitolaw@gmail.com

Attorney for Debtor(s)